

Message

From: Aranda, Amber [aranda.amber@epa.gov]
Sent: 11/1/2022 5:28:26 PM
To: Gavin, Quinn [Gavin.Quinn@epa.gov]
Subject: RE: Follow-up on Discussion of Treated Articles in AD

Importance: High
Flag: Follow up

Quinn – I think it might be good to have a follow up discussion to walk through the explanation in the treated seed response and how it might apply to other products, per the language and guidance on the regulatory text. Could you schedule something? See my draft notes on the issues below.

Amber L. Aranda
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From: Flint Silva, Tara <FlintSilva.Tara@epa.gov>
Sent: Tuesday, November 1, 2022 12:17 PM
To: Gavin, Quinn <Gavin.Quinn@epa.gov>; Gayoso, Jose <Gayoso.Jose@epa.gov>; Manupella, Matthew <Manupella.Matthew@epa.gov>; Arrington, Linda <Arrington.Linda@epa.gov>; Aranda, Amber <aranda.amber@epa.gov>; Bartow, Susan <Bartow.Susan@epa.gov>
Subject: RE: Follow-up on Discussion of Treated Articles in AD

Hi all,

Glad to help out/participate on this work as you guys work through things with treated seeds and implications for other treated articles.

I took a look at the documents you provided and just had a couple thoughts..may or may not be useful and I'm sure most of them have been discussed by you guys in previous meetings!

In terms of the labeling mitigation suggested in the Word doc:

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Some thoughts from the petition response:

Ex. 5 Deliberative Process (DP)

in.

Look forward to seeing where this all goes.

Thanks,

Tara Flint Silva
(she/her)

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From: Gavin, Quinn <Gavin.Quinn@epa.gov>

Sent: Tuesday, November 1, 2022 7:06 AM

To: Gayoso, Jose <Gayoso.Jose@epa.gov>; Manupella, Matthew <Manupella.Matthew@epa.gov>; Flint Silva, Tara <FlintSilva.Tara@epa.gov>; Arrington, Linda <Arrington.Linda@epa.gov>; Aranda, Amber <aranda.amber@epa.gov>; Bartow, Susan <Bartow.Susan@epa.gov>

Subject: Follow-up on Discussion of Treated Articles in AD

Good Morning,

Thank you for meeting yesterday. I think it was very helpful to hear about the treated articles in AD and begin discussing how we might move forward. I have attached the petition response and our current proposed standardized mitigation language (still being edited). In the petition response we discussed developing an ANPRM, which we are working on now, that would raise the possibility of a 3a Rule under FIFRA which would allow for the enforcement on treated articles without their registration. I will set up another meeting in the near future where we can begin talking about how the treated articles in AD may be affected by this. I am hoping to develop some similar language to our template for other articles. I know that there was some concern from AD regarding labeling and its appropriateness for some articles so if any of you have further thoughts on that please let me know. I look forward talking you all again soon.

Thank you,
Quinn

Quinn Gavin
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